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Attorneys for Defendants
02 OPTICAL MEDIA, INC. and DAVID CHOU

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KONINKLIJKE PHILIPS
ELECTRONICS N.V. and U.S.
PHILIPS CORPORATION,

Plaintiffs,

v.

O2 OPTICAL MEDIA, INC. and
DAVID CHOU,

Defendants.

CASE NO. C-07-0858-SI

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE AND FOR
AN EXTENSION TO COMPLETE INITIAL
DISCLOSURES AND FILE A CASE
MANAGEMENT STATEMENT AND RULE
26(F) REPORT**

Pursuant to Federal Rule of Civil Procedure ("FRCP") 26 and Northern District Civil
Local Rules 6-1(b) and 16-2(e), plaintiffs Koninklijke Philips Electronics N.V. and U.S. Philips
Corporation (collectively, "Philips") and defendants O2 Optical Media, Inc. and David Chou
(collectively, "Defendants"), by and through their respective counsel of record, hereby stipulate
and agree to continue the Initial Case Management Conference (currently scheduled for Friday,
June 8, 2007 at 2:00 p.m.) to Friday, June 15, 2007 at 2:00 p.m., or such other date and time as
the Court may order. The parties further stipulate and agree to extend the deadline for the parties

536272.2

STIPULATION AND [PROPOSED] ORDER TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND FOR AN EXTENSION
TO COMPLETE INITIAL DISCLOSURES AND FILE RULE 26 DISCLOSURES AND CASE MANAGEMENT STATEMENT C-07-0858-SI

1 to complete initial disclosures pursuant to Rule 26 (or state objections to making such
2 disclosures), and to file and serve a Case Management Statement and a Rule 26(f) report from
3 Friday, June 1, 2007, to Friday, June 8, 2007.

4 This stipulation is submitted on the following grounds:

5 1. Philips filed the above-captioned lawsuit against Defendants on October 6, 2006 in
6 the United States District Court for the Central District of California (Case No. CV 06-6382 ER);

7 2. Defendants answered Philips' Complaint on November 20, 2006;

8 3. On February 5, 2007, pursuant to 28 U.S.C. § 1404(a), the Honorable George P.
9 Schiavelli transferred the case to the United States District Court for the Northern District of
10 California (Case No. C 07-0858 BZ), where it was subsequently assigned to the Honorable Susan
11 Illston;

12 4. The Initial Case Management Conference in this matter is presently scheduled for
13 June 8, 2007 at 2:00 p.m.

14 5. FRCP Rule 26 and Northern District Civil Local Rule 16-2(e) permit the parties to
15 submit a stipulation and request that the Court vary the dates of the initial case management
16 schedule and dates for initial disclosure and meet and confer pursuant to FRCP Rule 26.

17 7. Based on the foregoing, the parties to the above-captioned matter, by and through
18 their respective undersigned counsel, hereby agree and stipulate as follows:

19 a. To continue the date for the Case Management Conference currently set for
20 June 8, 2007 at 2:00 p.m., until June 15, 2007 at 2:00 p.m., or such other date and time as the
21 Court may order;

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b. To extend the last day to complete initial disclosures pursuant to Rule 26, (or state objections to making such disclosures), and to file and serve a Case Management Statement and a Rule 26(f) report from Friday, June 1, 2007 to Friday, June 8, 2007.

IT IS SO STIPULATED.

Dated: May 30, 2007

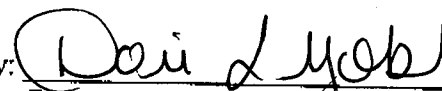
MAYER, BROWN, ROWE & MAW LLP

By: 
Rerla Chng

Attorneys for Plaintiffs KONINKLIJKE PHILIPS
ELECTRONICS N.V. and UNITED STATES
PHILIPS CORPORATION

Dated: May 30, 2007

HOPKINS & CARLEY

By: 
~~Robert A. Christopher~~ Dori L. Yob
Attorneys for Defendants
O2 OPTICAL MEDIA, INC. and DAVID CHOU

PURSUANT TO STIPULATION IT IS SO ORDERED.

Dated: _____


U.S. DISTRICT COURT JUDGE